

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

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ROSY GIRON DE REYES, ET AL.,

*Plaintiffs,*

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, ET AL.,

*Defendants.*

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Case No: 1:16CV563 (PTG/WBP)

**DEFENDANTS' MOTION TO EXCLUDE  
THE OPINIONS OF WILLIAM A.V. CLARK, PH.D.**

Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc. (collectively, "Defendants") move to exclude the opinions of William A.V. Clark, Ph.D, who is the purported demographics expert of Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (collectively, "Plaintiffs"). Waples is simultaneously filing a brief in support of this motion and a proposed order. Wherefore, Waples asks the Court to enter the proposed order and exclude Dr. Clark's opinions.

Dated: June 11, 2024

Respectfully submitted,  
**Waples Mobile Home Park Limited Partnership**  
**Waples Project Limited Partnership**  
**A.J. Dwoskin & Associates, Inc.**  
*By Counsel*

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### **CERTIFICATE OF SERVICE**

I certify that, on June 11, 2024, I caused the foregoing document to be filed via the Court's CM/ECF system, which will send notice to all counsel of record.

/s/ Michael S. Dingman  
Michael S. Dingman